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Downers
Grove
Sanitary
District

2710 Curtiss Street
P.O. Box 1412
Downers Grove, IL 60515-1412
1-312-969-0664

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LEGAL COUNSEL

Michael C. Wiedel

*Providing a Better Environment for South Central
DuPage County*

May 22, 1989

US EPA RECORDS CENTER REGION 5



430546

Chuck Banks
Code Enforcement Officer
Village of Downers Grove
801 Burlington
Downers Grove, IL 60515

Re: Discharge of High pH Wastewater to Storm Sewer by Dynagear, Inc.,
5100 Thatcher.

Dear Mr. Banks:

I have enclosed a letter written to Dynagear, Inc. in response to our discovery of water entering the storm sewer with a pH of 12.3. The letter fully described how it was found and our response to Dynagear to date.

We have had a telephone explanation from Dynagear and the discharge appears to be an inadvertent and one time event. Once we have the written report from Dynagear on this matter I will forward it on to you.

The water did not enter the stream, so there appears to be no stream impact.

Please feel free to contact me if you have any questions.

Sincerely,
Downers Grove Sanitary District

Janet M. Lacina
Laboratory Services Director

DOWNERS GROVE SANITARY DISTRICT
Prohibited Materials Discharge Report
July 1 through December 31, 1987

Company Name: DYNAGEAR, INC.

Address: 2500 Curtiss St.

Downers Grove, IL 60515

Report Completed by: Bob Johnson

Title: Training/Safety Director Phone: 312-969-1008

Describe the occurrence of any discharges of prohibited materials to the sanitary sewer system. Include the date, time, type of material discharged, its volume and concentration; when and what authorities were notified of the discharge; what actions were taken to control and clean up the material; and what actions were taken to prevent a recurrence.

On Thursday, October 8, 1987, at approximately 1600 Hours a routine check of the inspection manhole by staff of the Downers Grove Sanitary District revealed that oil had been discharged from the facility at 2500 Curtiss Street. As I noted to the Sanitary District in my letter of October 21, 1987 of Dynagear's intentions regarding the requirements of the violations; they have all been abated. Please note the attached for explanations.

(Please attach additional pages)

If no discharges occurred during the reporting period, please indicate that by checking the certification statement below.

"Based on my inquiry of the person or persons directly responsible for managing compliance with the accidental spill disposal and reporting requirements, I certify that to the best of my knowledge and belief, no solvents or toxics have been dumped or spilled into the wastewaters since filing the last "Prohibited Materials Discharge Report". I further certify that this facility is implementing the Solvent Management Plan submitted to The Downers Grove Sanitary District."

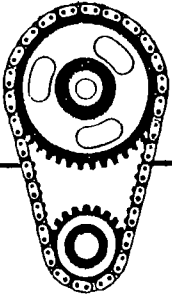
All reports must be signed by an Authorized Agent of the company named above:

Name of Authorized Agent: Bob Johnson

(Type or Print)

Signature: Bob Johnson

Title: Training/Safety Director Date: January 25, 1988



***dynagear* Inc.**

2500 Curtiss • Downers Grove, Il. 60515 • (312) 969-1008

October 21, 1987

Mr. Lawrence C. Cox
Manager
Downers Grove Sanitary District
2710 Curtiss Street
Downers Grove, Il 60515

Dear Mr. Cox

Dynagear is sincerely pleased to learn of any violations at the facility of 2500 Curtiss Street and will always do whatever is necessary to correct them. In response to you regarding the requirements of the violations, after investigation, it is apparent as you suggest that an employee action was the cause of the discharge. Although we believe the individual did not realize the seriousness of the situation.

Corrective action will be taken by regular employee training meetings to instruct about the proper disposal of materials. Also supervisory procedures will be prepared and supervisors will verify that proper disposal procedures are implemented by all employees.

The general contractor has been contacted and he along with the plumbing sub-contractor will correct the back pitched sewer pipe as well as correcting the proper installation of the inspection manhole casting. When this is completed Dynagear will be pleased to make you aware of the correction.

Please note the attached exhibit that is an insert extracted from Dynagear's supervisors hazard communication manual that hopefully is an indication of our good intentions to always meet the obligations as prescribed by Downers Grove Sanitary District.

Sincerely,

Dynagear, Inc
Bob Johnson
Training/Safety Director

EXHIBIT A-2

MEMO

TO: Ed Witchie, Mark Baker, Rex Giesler, Dick Brosius

FROM: Bob Johnson

RE: Commitment to Downers Grove Sanitary District

Along with the responsibilities that you are accountable for I believe it would be helpful for you to have on file the commitment that Downers Grove Sanitary District has asked our company to adhere to. Please notice two enclosed documents that I was to prepare for the sanitary district by July 31, one the "Solvent Management Plan" and the other a "Spill Prevention and Containment Plan."

I suggest you note and read thoroughly the semi-annually "prohibited materials discharge report" of the Solvent Management Plan.

Please, Please instruct your supervisors to abide by our commitment to items (q), (r), (s), and (t) of the Spill and Containment Plan, or I can envision us having a confrontation one day with the Downers Grove Sanitary District.

Thanks for your cooperation.

EXHIBIT A-2

SUPERVISORS' HAZARD COMMUNICATION MANUAL

"Employee Training Procedures"

Supervisors are asked to adhere to the following recommendations when informing employees about the "Hazard Communication Program". While following these procedures, it will assure that all employees are presented the necessary information pertaining to the "Right-to-Know" law uniformly. The right-to-know information summary should provide you with all the background one will need to follow the training outline. By checking off each topic as it is presented, this will document that all employees will have been exposed to all areas of the outline. Topics A thru F of the outline are important, but perhaps topic "G" would be of more importance to insure certification of the training by the supervisor's signature. All employees should view the video tape Hazard communication "Employee Introduction", as well as take the simple short test of the tape material. We also have the tape and test in Spanish. Video tapes are available with more detailed information about "Material Safety Data Sheets, Hazardous Materials in the Workplace, Toxicology, Proper Handling of Chemicals, Health Hazards and Fire & Explosions, that certain departments may feel their employees should view. Not all of them are in Spanish. A schedule will be made in order that all supervisors will view all of these tapes. Please arrange for employee viewing of video tapes via Bob Johnson.

Supplemental information will be forthcoming to you periodically to update the supervisor's manual.

1-16-88

TO: PLANT MANAGERS
FROM: BOB JOHNSON
Re: "Right to know law" Employee training procedures.

One year ago this February the company formally instituted the federally mandated "Right-to-Know" laws' HAZARD COMMUNICATION PROGRAM. It is easy to rationalize that we soon got side-tracked from the implementation due to the moving from 5200 Thatcher to our new facility. However (and thanks to most everyone's hardwork we are back to full production in all departments) now we must reinstitute the HAZ-COM program. To assure that this will be accomplished I am calling a meeting for all supervisors on January 22 from 2:30-3:30 pm in the training room at 2500 Curtiss st. (All supervisors must attend). The specific purpose of the meeting will be two-fold, (1) there is a legislative mandate that the program should be reviewed yearly to see that its provisions are being carried out, and (2) to re-emphasize the supervisors responsibility of informing their new hirees of the "Right-to-Know" law. To further assure that we meet our obligations of the HAZ-COM program I have asked the personnel dept. to provide me a list each week of new hirees in your departments. Along with this list I will attach a single page sign-off sheet that the supervisor will verify that he has followed the employee training procedures that are in his supervisors hazard communication manual. After the orientation of new employees, which should happen no later than the second week of employment, the supervisor will return the sign-off sheet to me for my files. In my monthly report to Lou regarding compliance of Dynagear's three facilities he has asked me to make note of any supervisors negligence to this procedure. Your supervisors will be given a notice of the meeting.

cc: Lou Nair
Ray Campbell
Mark Baker
Rex Giesler
Jim Ried
Ed Witchie

1-19-88

NOTICE

TO: All supervisors
FROM: Bob Johnson
Re: Dynagears' HAZ-COM program (Employees "Right-to-Know" law).

Please make a note of the very important meeting scheduled January 22 (friday) from 2:30-3:30 pm in the training room at 2500 Curtiss st.

The purpose of the meeting is twofold. First there is a legislative mandate that the program should be reviewed yearly to see that its provisions are being carried out and secondly to re-emphasize the supervisors responsibility of informing the new hirees of the "Right-to-Know" law.

I will review with you once again the procedures that are in your Supervisors Hazard-Communication Manual (blue 3-ring binder), please bring yours to the meeting with you. We will want to discuss any questions you may have pertaining to the program.

Again I stress the importance of your attendance because from this date on you will be expected to implement all aspects of the program for that which you are responsible.

See you friday at 2:30 PM.

TRAINING OUTLINE
RIGHT-TO-KNOW LAW

DATE OF TRAINING _____ TIME OF SESSION _____

TOPICS COVERED

A) Hazardous Materials in Workplace

- ☐ (1) Specific Description
- ☐ (2) Physical Characteristics
- ☐ (3) Properties
- ☐ (4) Uses
- ☐ (5) Warning Signs

B) MSDS Information

- ☐ (1) Location of MSDS file
- ☐ (2) How to Read an MSDS
- ☐ (3) Label Precautions
- ☐ (4) Re-labeling Procedures

C) Safe Work Practices

- ☐ (1) Personal Protective Equipment
- ☐ (2) Preparation of Work Area
- ☐ (3) Equipment Maintenance
- ☐ (4) Working Techniques
- ☐ (5) Clean-up Procedures
- ☐ (6) Health Effects
- ☐ (7) Additional Safety Procedures

D) What To Do In An Emergency

- ☐ (1) Spill and Leak Procedures
- ☐ (2) Fire and Explosion
- ☐ (3) Falls, Slips and Trips
- ☐ (4) Electrical
- ☐ (5) Equipment Malfunction
- ☐ (6) First Aid Equipment

E) Who To Contact In An Emergency

- ☐ (1) In-plant Responsible Persons
- ☐ (2) Medical/Fire/Emergency Facilities
- ☐ (3) Location of Required Information for Medical Treatments

F) Safety Program Documentation

- ☐ (1) Testing
- ☐ (2) Employee Certification of Training

☐ Supervisor's Name _____

☐ Date When Training Program Was Conducted _____